

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN  
DISASTER SITE LITIGATION

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HECTOR BETANCOURT,

Plaintiff(s), Index No.: 07cv4453

-against-

**NOTICE OF ADOPTION**

**1:21-MC-00102-AKH**

ALAN KASMAN DBA KASCO, AMERICAN  
EXPRESS BANK, LTD, AMERICAN EXPRESS  
COMPANY, AMERICAN EXPRESS TRAVEL  
RELATED SERVICES COMPANY, INC.,  
BANKERS TRUST COMPANY, BATTERY  
PARK CITY AUTHORITY, BFP ONE LIBERTY  
PLAZA CO., LLC., BFP TOWER C CO. LLC.,  
BFP TOWER CMM LLC., BLACKMONMOORING-  
STEAMATIC CATASTOPHE, INC.  
D/B/A BMS CAT, BROOKFIELD FINANCIAL  
PROPERTIES, INC., BROOKFIELD FINANCIAL  
PROPERTIES, LP, BROOKFIELD PARTNERS,  
LP, BROOKFIELD PROPERTIES  
CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS INC., BT PRIVATE CLIENTS  
CORP., DEUTSCHE BANK TRUST COMPANY,  
DEUTSCHE BANK TRUST COMPANY  
AMERICAS, DEUTSCHE BANK TRUST  
CORPORATION, ENVIROTECH CLEAN AIR,  
INC., GENERAL RE SERVICES CORP., GPS  
ENVIRONMENTAL CONSULTANTS, INC.,  
HILLMAN ENVIRONMENTAL GROUP, LLC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY,  
INC., KASCO RESTORATION SERVICES CO.,  
LEHMAN BROTHERS HOLDINGS INC.,  
LEHMAN BROTHERS, INC., LEHMAN  
COMMERCIAL PAPER, INC., MCCLIER  
CORPORATION, MERRILL LYNCH & CO,  
INC., NATIONAL ASSOCIATION OF  
SECURITIES DEALERS, INC., NEW LIBERTY  
PLAZA LP, NEW YORK CITY ECONOMIC  
DEVELOPMENT CORPORATION, NEW YORK  
CITY INDUSTRIAL DEVELOPMENT AGENCY,  
NEW YORK CITY INDUSTRIAL  
DEVELOPMENT CORPORATION, ONE  
LIBERTY PLAZA, STRUCTURE TONE (UK),

INC., STRUCTURE TONE GLOBAL SERVICES,  
INC., THEBANK OF NEW YORK TRUST  
COMPANY NA, THE BOARD OF MANAGERS  
OF THE ONE LIBERTY PLAZA  
CONDOMINIUM (CONDO #1178), THE ONE  
LIBERTY PLAZA CONDOMINIUM (CONDO  
#1178), TISHMAN INTERIORS CORPORATION,  
TRAMMELL CROW COMPANY, TRAMMELL  
CROW CORPORATE SERVICES, INC.,  
WESTON SOLUTIONS, INC., WFP ONE  
LIBERTY PLAZA CO., L.P., WFP ONE  
LIBERTY PLAZA, CO. GP, CORP., WFP  
RETAIL CO. G.P. CORP., WFP RETAIL CO. L.P.,  
WFP TOWER D CO. G.P. CORP., WFP TOWER  
D HOLDING CO. I L.P., WFP TOWER D  
HOLDING CO. II L.P., WFP TOWER  
DHOLDING I G.P. CORP., WFP TOWER D. CO.,  
L.P., AND WORLD FINANCIAL PROPERTIES,  
L.P., ET AL,

Defendant(s).

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C O U N S E L O R S :

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP, LLC, (hereinafter HILLMANN) as and for it's response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York  
September 11, 2007

Yours, etc.,

**SAM ROSMARIN, PLLC**



By: \_\_\_\_\_  
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**SERVICE RIDER**

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**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

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All parties indicated on the  
**SERVICE RIDER**



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Cristina A. Villani

Sworn to before me this  
11th day of September 2007



Charlene S. Rogers  
Notary Public  
No. 01RO 4703494  
Qualified in Westchester County  
Commission Expires 11/30/09